

In the Matter of)
)
Wireless Telecommunications Bureau)
Seeks Comment on Petitions for) DA 04-567
Reconsideration and/or Clarification of) February 26, 2004
The Hearing Aid Compatibility)
Telephones Report and Order)

and

Section 68.4(a) of the Commission's Rules)
Governing Hearing Aid) WT Docket No. 01-309
Compatible Telephones) RM-8658
)

COMMENTS
OF
AMERICAN NATIONAL STANDARDS INSTITUTE
ACCREDITED STANDARDS COMMITTEE C63 (EMC)
SUBCOMMITTEE 8 (Medical Devices)
ANSI ASC C63 SC8

American National Standards Institute Accredited Standards Committee 63

(ANSI ASC C63) [Electromagnetic](#) Compatibility (EMC) Subcommittee 8 (Medical Devices) is pleased to respond to the FCC (Commission) request for comments in response to the petition for reconsideration, issued relative to the above-captioned docket, regarding changes to the exemption for mobile telephones to the rules governing Hearing Aid Compatibility (HAC).¹

The use of ANSI C63.19, *The American National Standard for Methods of Measurement of Compatibility between Wireless Communications Devices and Hearing Aids*, is one of the issues raised in the request for comment. [These comments are restricted to this issue.](#)

As the ANSI accredited committee to coordinate EMC standards in the US, ANSI ASC C63 has had a longstanding interest in all issues of electromagnetic interference, including interference involving medical devices and telecommunications products. Further, [the broad](#)

base of membership consisting of individual manufacturing companies, professional and trade organizations, testing laboratories, and individual experts provides a high level of technical expertise to be applied to the tasks it undertakes. An annex that shows the membership of C63 is attached. This list demonstrates the breadth and expertise represented in the committee. It should be particularly noted that key stakeholders in this issue are represented, such as the FCC, FDA, and ATIS.

ANSI C63.19 was first published in 2001. That version was the result of five years of effort by the committee. As is required by ANSI bylaws, the committee made efforts to assure that all materially affected interests were represented in the committee. We believe that objective was achieved, all interests were well represented in the committee and the first version of the standard represented the best technical consensus available at the time of publication. An annex is also provided which identifies the members of the Task Group (committee) which developed ANSI C63.19-2001.

Standards are living documents. By its bylaws, ANSI requires that all standards be reviewed at a minimum of every five years. Standards may be reviewed and revised more frequently to assure that they continue to be technically current and reflect changing needs and requirements. Further, if the standard is not acted upon to revise or reaffirm it within 10 years; it is automatically withdrawn which again shows the commitment to keep the standard current.

With the adoption of ANSI C63.19 by the FCC, and the subsequent increased experience gained in many testing laboratories and because of technological changes in both the hearing aid and telephone industries it soon became apparent that a revision to ANSI C63.19 was needed. ANSI ASC C63 approved the revision project in the fall of 2003. A revised version of ANSI C63.19 was submitted to ballot in late 2003 and early 2004 and successfully passed. However, there were both negative votes and a number of substantive comments and recommendations on the draft revision. These comments are being considered at this writing and

¹ See 47 U.S.C. §610(b)(2)(B)

it is the goal of the Task Group Chair to achieve consensus on the comments to the extent possible. A recirculated-ballot of the revised standard is anticipated within the next few weeks and should be completed by late April 2004. ANSI ASC 63 procedures requires us to indicate the disposition of the comments and negative ballots (which may be accepted or not) or whether they are held for the next revision if considered “future work.” These procedures have been carefully developed and have for many years served to give all viewpoints a fair hearing but, finally, deliver the consensus majority view in the published standards.

ANSI ASC C63 Subcommittee 8 believes that the FCC was well advised to adopt ANSI C63.19 in its rulemaking. That document represented the best technical consensus at the time. As is demonstrated in this case; the strength of the consensus standards process is that standards are regularly reviewed and kept current. The new version of ANSI C63.19 will represent an improvement to the first version and will properly reflect the increased knowledge on this topic gained during the period between the two versions of the standard. Therefore, it can be anticipated that ANSI ASC C63 will support the FCC adoption of the new version of ANSI C63.19 when it becomes final.

We note that the Alliance for Telecommunications Industry Solutions (ATIS) was on the balloting group and provided their approval and support for this revision. Similarly, HIA and representatives of the hearing industry were represented on the balloting group.

At this time, through cooperative efforts, a revised standard has been produced and an encouraging trend of compliant products is emerging. A further revision to ANSI C63.19 has been prepared and is in the review and approval process. All materially interested views are being represented in the process and we believe the concerns that led to the issue being raised in a petition for reconsideration have been addressed successfully. Therefore ANSI ASC C63 Subcommittee 8 recommends that the FCC stand by its recognition of the original version of ANSI C63.19 and further, that it review and adopt the new revision expeditiously, when it is completed.

We thank the Commission for this opportunity to comment on this proposed rulemaking.

Respectfully submitted on behalf of,

ANSI ASC C63 Subcommittee 8

Mr. Dan Hoolihan
Chair, ANSI ASC C63 Subcommittee 8

Hoolihan EMC Consulting
32515 Nottingham Court
P.O. Box 367
Lindstrom, MN 55045
(651) 213-0966

March 26, 2004

Annex A – Participants in ANSI C63.19-2001

At the time that Accredited Standards Committee C63 approved this standard, Task Group C63.19, the committee, which prepared this standard, had the following membership:

Name	Organization
H. Stephen Berger, Co-Chairman	Siemens ICM
Tom Victorian, Co-Chairman	Starkey Laboratories
Edwin L. Bronaugh, Secretary	Siemens ICM CD/EdB EMC Consultants
Ron Amundson	TUV Product Service
Horst Arndt	Unitron Industries
Mario Augustyniak	Gennum Corp.
Richard Brander	Beltone Electronics
Marco Candiago	Unitron Industries
Asok Chatterjee	Pacific Bell Mobile Services
Sunil Chojar	Siemens Hearing Instruments, Inc.
Mohamed El-Rayes	Nokia Telecomm
Joe Fazio	Siemens Hearing Institute
Oscar Garay	Ilson America
Bert Geerdink	EHIMA
Fang Han	Nokia Research Center
Steve Hausworth	Motorola
Don Heirman	Lucent Technologies
Daniel Hoolihan	TÜV Product Service
Ron Johnsen	Ericsson
Scott Kelly	Motorola
Mead Killion	Etymotic Research
Linda Kozma	Gallaudet University
Barry Kratz	Ericsson
Shalini Lakshminarayanan	Univ. of Oklahoma EMC Center
Harry Levitt	Lexington Rehabilitation Engineering
Norm Matzen	Etymotic Research
Ron Magnuson	Siemens Business Communication Systems, Inc.
David Means	Federal Communication Commission
Paul Moller	Motorola
Jay Moulton	Qualcomm Inc.
Doug Neeley	Nokia
Virginia Parker	Qualcomm
Brodie Pedersen	TUV Product Service
Dave Preeves	Microtech
Shiva Raman	University of Oklahoma EMC Center
David Roberson	Consultant
Mike Sacha	Starkey Laboratories

Ronald Scicluna	Argosy Electronics, Inc.
Tom Scheller	Telex
Robert Schlegel	University of Oklahoma EMC Center
Marlene Skopec	Food and Drug Administration
Charles Spann	Nortel
Steve Thompson	Knowles Electronics, Inc.
Harry Teder	Hearing Industries Association
Russ Thoma	Etymotic Research
Anatoly Tsaliovich	AT&T
Jacek Wojcik	APREL Laboratories/Spectrum Science Institute
David Woodbury	Hearing Industry Association

Annex B – Current ANSI ASC 63 Membership

Organizational Members

ACIL
ARRL
ATIS
Curtis-Strauss, LLC
Dell
Department of Defense – JCS
FCC
FDA
Hewlett-Packard
IEEE – EMC Society
IEEE – Standards Association
ITIC
Lucent
NIST
SPAWAR – US Navy
Southwest Research Institute
TUV America/TUV Product Service
Underwriters Laboratories

Individual Members

Bob Hofmann
Dan Hoolihan
John Lichtig
Herb Mertel
Werner Schaefer
Ralph Showers